

# **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ALI KARIMI, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT, JOHN  
CRYAN, AND CHRISTIAN SEWING,

Defendants.

**Case No. 1:22-cv-02854-JSR**

**DECLARATION OF PERETZ BRONSTEIN REGARDING FEES AND EXPENSES OF  
BRONSTEIN, GEWIRTZ & GROSSMAN, LLC**

I, Peretz Bronstein, declare and state, under penalty of perjury:

1. I am a member of the law firm Bronstein, Gewirtz & Grossman, LLC (“BGG”). I am submitting this declaration in support of Pomerantz LLP’s (“Pomerantz” or “Lead Counsel”) Motion For An Award Of Attorneys’ Fees, Reimbursement Of Expenses, And Compensatory Awards To Plaintiffs in connection with services rendered in the class action styled as *Karimi v. Deutsche Bank Aktiengesellschaft, et al.*, No. 1:22-cv-02854-JSR (S.D.N.Y.) (the “Action”).

2. At all times during the Action, BGG served as principal liaison counsel to Court-appointed Lead Plaintiff Yun Wang (“Wang” or “Lead Plaintiff”) and Named Plaintiff Ali Karimi (“Karimi” or “Named Plaintiff,” and, with Wang, “Plaintiffs”).

3. The information in this declaration regarding BGG’s work in this Action is taken from supporting documentation, *e.g.*, notes and emails, which were prepared by the Firm in the course of serving as additional counsel. Because BGG did not keep contemporaneous records of billable hours on this matter, BGG does not seek to have its hours included in Lead Counsel’s lodestar.

4. My partner Eitan Kimmelman (“Kimmelman”) and I were the key liaison between Lead Plaintiff and Named Plaintiff, and Lead Counsel. At the outset of the Action, Kimmelman and I explained the roles and duties of serving as lead plaintiff to Wang and of acting as a named plaintiff to Karimi, particularly how they were fiduciaries of Class Members and needed to consider the interests of all Class members at all stages of the Action. We worked with Karimi and Wang to gather trade records filed with the initial complaint in this action and with Wang’s motion to be lead plaintiff, respectively. We also presented the lead plaintiff motion to Wang, explained its contents, addressed questions and concerns, provided comments to Lead Counsel and ensured that those comments were addressed in the filed motion.

5. Similarly, we presented the Amended Complaint, Second Amended Complaint, and Third Amended Complaint (collectively, the “Complaints”) to each of Wang and Karimi, explained their contents, the reasons why Lead Counsel sought to file each of the Complaints, and addressed any questions or concerns.

6. Likewise, we presented to each of Plaintiffs Lead Counsel’s oppositions to Defendants’ motion to transfer this action from the District of New Jersey to this Court and Defendants’ motion to dismiss, explained the purpose of each opposition, its procedural role in the Action, and the effect the grant or denial of each motion would have on this Action, Plaintiffs’ claims, and the claims of Settlement Class Members.

7. When Defendants served document production requests on Plaintiffs, we explained each request to each of Wang and Kimmelman and helped them search for responsive documents. Further, when Lead Counsel prepared responses and objections to those requests, we presented those responses and objections to Plaintiffs, explained their purpose in the Action, and confirmed that the responses were accurate.

8. Kimmelman and I also participated in deposition preparation sessions with each of Wang and Karimi, explained the types of subject matter and questions they should expect their depositions to concern and include, and addressed questions about the purpose of the depositions, their subject matter, and how Wang and Karimi each could prepare for their respective depositions. BGG also attended each deposition.

9. BGG also explained the purpose and potential outcomes of the mediation sessions to Plaintiffs and helped obtain their approvals of the settlement.

10. BGG's resume/biography is attached hereto as Exhibit A.

11. BGG also respectfully submits that a compensatory award of twenty thousand U.S. dollars (\$20,000) to each of Lead Plaintiff and Named Plaintiff is reasonable for the reasons set forth in Section III.F of Lead Counsel's Memorandum Of Law In Support Of Lead Counsel's Motion For An Award Of Attorneys' Fees, Reimbursement Of Expenses, And Compensatory Awards To Plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.



Dated: December 26, 2022

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Peretz Bronstein

# **EXHIBIT A**

## BRONSTEIN, GEWIRTZ & GROSSMAN, LLC

60 East 42<sup>nd</sup> Street, Suite 4600, New York, NY 10165

Bronstein, Gewirtz & Grossman, LLC (BG&G) is a securities and consumer class action law firm. The firm also handles corporate and commercial litigation, as well as patent and trademark matters. BG&G has served as co-counsel and lead counsel in multiple securities class actions that have resulted in hundreds of millions of dollars in recovery for the classes.

### FIRM PRACTICE: SECURITIES AND CONSUMER CLASS ACTIONS

Bronstein, Gewirtz & Grossman represents individuals and businesses primarily in securities and consumer class actions. BG&G has served as lead counsel and co-counsel on behalf of plaintiff classes in numerous class actions.

### ATTORNEYS

**Peretz Bronstein**, founding member, focuses on corporate and securities litigation. After graduating from Harvard College and Harvard Law School, Peretz gained eight years of experience as a litigator at Skadden, Arps, Slate, Meagher & Flom, LLP. While at Skadden, He spent most of his time there defending class action lawsuits. He is a member of the New York State Bar, as well as the bars of the United States District Courts of the Southern and Eastern Districts of New York and the Second Circuit Court of Appeals.

**Edward N. (Chona) Gewirtz**, member, focuses on intellectual property law, including software patent and copyright issues and is a licensed patent attorney. Chona graduated from Cornell University, College of Arts and Sciences, and Cardozo Law School. He is a member of the New York and New Jersey bars, as well as the United States Patent & Trademark Bar.

**Neil D. Grossman**, member, practices primarily in commercial litigation and employment law. He is a graduate of Sarah Lawrence College and Rutgers University Law School. Neil is a member of the New York and New Jersey bars and heads the New Jersey office.

**Eitan Kimelman**, member, focuses primarily on plaintiff-side securities class actions, protecting shareholder rights. Eitan graduated from University of Michigan and New York Law School. He is a member of the New York Bar.

**Yitzchak E. Soloveichik**, member, represents plaintiffs and defendants in complex commercial litigation, in matters involving a broad range of issues and claims, including breach of contract, breach of fiduciary duty, conversion, professional malpractice, and common law and securities fraud. Yitzchak graduated *summa cum laude* in 2002 with a B.A. in philosophy and political science from Yeshiva University. In



2007, he received his J.D. from Harvard Law School, where he was an editor of the Journal of Law & Public Policy. After law school, Yitzchak served as a law clerk to The Honorable Robert S. Smith of the New York Court of Appeals. He previously practiced at Paul, Weiss, Rifkind, Wharton & Garrison LLP and Friedman Kaplan Seiler & Adelman LLP.

**Yitzhak Greenberg**, of counsel, represents parties in all facets of bankruptcy, including debtors, creditors, and chapter 7 and 11 trustees. He graduated Fordham University Law School where he served as an editor of the Environmental Journal. After law school, Mr. Greenberg served as a law clerk to the Honorable Arthur J. Gonzalez, United States Bankruptcy Judge.

## SUCCESSFUL RESULTS

- 2022: **Lerman v. Apple, Inc.**, 15-CV-07381 (E.D.N.Y.). Co-lead counsel. \$20 million settlement of class action by New York and New Jersey iPhone 4S owners alleging system slow down as a result of system upgrade.
- 2021: **In re Flint, Mich. Water Crisis Litigation**, 16-CV-10444 (E.D.Mi.). Plaintiff Exec. Comm. Member. Global settlement with State of Michigan for approx. \$600 million.
- 2020: **In re Spectrum Pharm., Inc. Inc. Sec. Lit.**, 16-CV-02279 (D.Nev.). Co-lead counsel. Case settled for approx. \$3 million.
- 2018: **M&M Hart Living Trust, et al. v. Global Eagle Entertainment, Inc., et al.**, 2:17-cv-1479-PA (C.D. Cal.). BG&G served as co-lead counsel in this securities class action case. The complaint alleged violations of Sections 10(b) and 20(a) of the Exchange Act, and the firm obtained a favorable settlement for the class.
- 2018: **Duncan et. al v. Joy Global Inc.**, 2:16-cv-1229-pp (E.D. Wisc.). BG&G served as co-lead counsel in this securities class action case. The complaint alleged violations of Sections 14(a) and 20(a) of the Exchange Act, and the firm secured a \$20 million settlement for the class.
- 2017: **In re CBD Energy Limited Securities Litig.**, 4:15-cv-01668 (S.D. Tex.). BG&G served as co-lead counsel in this securities class action case. The complaint alleged violations of Sections 10(b) and 20(a) of the Exchange Act, and the firm secured a favorable settlement for the class.
- 2016: **Hayes v. Magnachip Semiconductor Corp., Case No. 12-CV-1160 (Partial Settlement)**. BG&G served as co-counsel in this certified class action pending in the U.S. District Court for the Northern District of California. The complaint alleges violations of 10b and 20(a) of the Securities Exchange Act arising out of the company's issuance of false financial statements. The parties agreed to a partial settlement of the action for \$23.5 million in cash.
- 2016: **Groupon Inc. Securities Litigation, Case No. 12-CV-02450**. BG&G was co-counsel in this class action in the U.S. District Court for the Northern District of Illinois. The complaint alleged that the online coupon company misled them in the prospectus and registration statement. Judge Norgle approved a \$45 million settlement for Groupon shareholders.
- 2015: **Cole v. Duoyuan Printing, Inc., Case No. 10-CV-7325**. BG&G was co-counsel in this class action in the U.S. District Court for the Southern District of New York. The complaint alleged violations of §§ 11, 12(a)(2) of the Securities Act of 1933 and §§10b of the Securities Exchange

Act arising out of the company's issuance of materially misleading statements about the company's financial condition and internal controls. Settled for \$6,193,750.

- 2015: **Silvercorp Metals, Inc. Securities Litigation, Case No. 12-CV-9456**. \$14 million settlement. BG&G co-counsel in class action in the U.S. District Court for Southern District of New York. The complaint alleged violations of §§10b of the Securities Exchange Act arising out of the company's issuance of materially false and misleading financial information.
- 2014: **Blitz v. AgFeed Industries, Case No. 11-CV-0992**. BG&G was co-counsel in this consolidated class action in the U.S. District Court for the Middle District of Tennessee. The complaint alleged violations of §§10b and 20(a) of the Securities Exchange Act arising out of the company's issuance of materially false and misleading financial information. The parties agreed to settle this action for \$7 million in cash.
- 2012: **Great Wolf Resorts, Inc. Shareholder Litig., Case No. 7328-VCN (Del. Ch. 2012)**. BG&G served as co-counsel and obtained a \$93 million increase in merger consideration – representing a 57% premium over the original deal price. We also improved the deal terms by negotiating for a waiver of standstill agreements that were precluding potential bidders from making a topping bid for the company.
- 2012: **MannKind Corporation Securities Litigation, Case No. 11-CV-00929 (C.D. Cal.)**. BG&G co-counseled a securities class action and helped obtain a \$22 million settlement. The action alleged that the defendants falsely represented the prospects for its AFREZZA product for the treatment of adult patients with Type 1 and Type 2 diabetes.
- 2011: **Force Protection, Inc. Sec. Litig., Case No. 08-CV-845 (D.S.C.)**. BG&G co-counseled a securities class action and helped obtain a \$24 million settlement on behalf of the investor class, which was represented by the firm's class representative client.
- 2011: **Medicis Pharm. Corp. Sec. Lit., Case No. 08-CV-1821 (D.Az.)**. BG&G co-counseled and secured a favorable settlement agreement, which provided an \$18 million payment to the shareholder class.

## LOCATIONS

- New York, NY
- Lake Hiawatha, NJ
- Los Angeles, CA